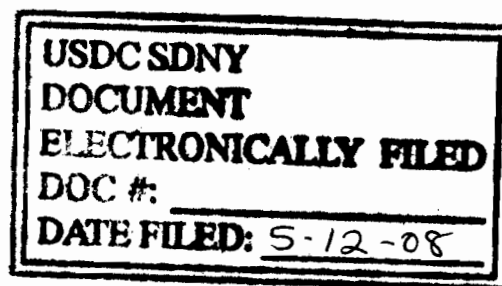


ORIGINAL

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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 Ann Marie Holcomb,

Plaintiff.

v.

COOPER UNION FOR THE
 ADVANCEMENT OF SCIENCE AND
 ART (COOPER UNION)

Defendant.
 -----X

07 CV 9797 (LBS)

**JOINT PROPOSED
 SCHEDULING ORDER**

Plaintiff, *pro se*, and Defendant, by and through its undersigned counsel, hereby submit the following Joint Proposed Scheduling Order for consideration by the Court:

I. Proposed Discovery Schedule

1. Motions to amend pleadings including joinder of additional parties shall be filed by **July 1, 2008**.
2. Discovery shall be completed as follows:
 - a. Initial disclosures shall be completed by **June 17, 2008**.
 - b. All document requests and interrogatories shall be served by **July 21, 2008**.
 - c. All depositions shall be completed by **November 4, 2008**.
 - d. All fact discovery shall be completed by **November 4, 2008**.
 - e. All expert discovery shall be completed **within 90 days** from the Court's ruling on any dispositive motions (including summary judgment).

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3. All dispositive motions, including summary judgment motions, shall be filed by **January 15, 2009**.
4. The parties anticipate **3-4 days** for trial.
5. No motions are pending at this time.

II. Status of Settlement Discussions

Defendant and Plaintiff have commenced settlement discussions which are expected to continue in the immediate future.

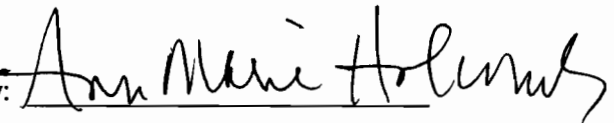
Dated: May 7, 2008
New York, New York

By: 

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Date: 5/5/2008

Pro Se

SO ORDERED:


HON. LEONARD B. SAND

Date: 5/12/08